

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JACKSONVILLE POLICE AND FIRE
PENSION FUND, on behalf of itself and
all others similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL
GROUP, INC., MARTIN SULLIVAN,
STEVEN BENSINGER, JOSEPH
CASSANO, and ROBERT LEWIS,

Defendants.

CIV. NO. 08-CV-4772

Hon. Richard J. Sullivan

**THE CITY OF SAGINAW POLICE
AND FIRE PENSION BOARD'S
MOTION FOR CONSOLIDATION
OF ALL RELATED ACTIONS,
APPOINTMENT OF LEAD
PLAINTIFF, AND APPROVAL OF ITS
SELECTION OF LEAD COUNSEL**

JAMES CONNOLLY, Individually and on
behalf of all others similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL
GROUP, INC., MARTIN J. SULLIVAN,
STEVEN J. BENSINGER, JOSEPH J.
CASSANO, ROBERT E. LEWIS, and
DAVID L. HERZOG,

Defendants.

CIV. NO. 08-CV-5072

Hon. Richard J. Sullivan

MAINE PUBLIC EMPLOYEES
RETIREMENT SYSTEM, on behalf of
itself and all others similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL
GROUP, INC., MARTIN SULLIVAN,
STEVEN BENSINGER, JOSEPH
CASSANO, and ROBERT LEWIS,

Defendants.

CIV. NO. 08-CV-5464

Hon. Richard J. Sullivan

ONTARIO TEACHERS' PENSION PLAN
BOARD, on behalf of itself and all others
similarly situated,

Plaintiff,

v.

AMERICAN INTERNATIONAL
GROUP, INC., MARTIN SULLIVAN,
STEVEN BENSINGER, JOSEPH
CASSANO, and ROBERT LEWIS,

Defendants.

CIV. NO. 08-CV-5560

Hon. Richard J. Sullivan

**THE CITY OF SAGINAW POLICE AND FIRE PENSION BOARD'S MOTION
FOR CONSOLIDATION OF ALL RELATED ACTIONS, APPOINTMENT AS
LEAD PLAINTIFF AND APPROVAL OF ITS SELECTION OF LEAD COUNSEL**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that the City of Saginaw Police and Fire Pension Board (“SPFPB”) will and hereby does move this Court on a date and at such time as may be designated by the Court, for an order: (i) consolidating all related actions; (ii) appointing the SPFPB as the Lead Plaintiff in the consolidated action and any subsequently filed related cases, and (iii) approving its selection of Lockridge Grindal Nauen P.L.L.P. and Mager & Goldstein LLP to represent it as Co-Lead Counsel. In support of this Motion, the City of Saginaw Police and Fire Pension Board submits the accompanying memorandum of law and the Affidavit of Lisa M. Pollard.

DATED: July 21, 2008

Respectfully Submitted,

/s/ Lisa M. Pollard

Lisa M. Pollard

LOCKRIDGE GRINDAL NAUEN, P.L.L.P.

Lisa M. Pollard, Esq.

One Pennsylvania Plaza, Suite 2020

New York, NY 10119

Telephone: (212) 271-8232

Facsimile: (212) 271-8258

lpollard@locklaw.com

LOCKRIDGE GRINDAL NAUEN, P.L.L.P.

Richard A. Lockridge, Esq.

Karen Hanson Riebel, Esq.

Nathan D. Prosser, Esq.

100 Washington Avenue South, Suite 2200

Minneapolis, MN 55401

Telephone: (612) 339-6900

Facsimile: (612) 339-0981

Jayne Goldstein
MAGER & GOLDSTEIN LLP
1640 Town Center Circle, Suite 216
Weston, FL 33326
Telephone: 954-515-0123
Facsimile: 954-515-0124
jgoldstein@magergoldstein.com
[Proposed] Co-Lead Counsel